

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

IN RE:

INTECO INTERNATIONAL TRADE, LLC,

Chapter 7

Case No. 10-45337 (NLW)

Debtor

BARBARA A. EDWARDS, as the successor chapter
7 Trustee for Inteco International Trade, LLC,

Plaintiff,

v.

PETER SINETOS,

Adv. Pro. No. 12-2137

Defendant

PETER SINETOS, defendant *pro se*, for his Answer to the Trustee's Complaint, alleges as follows:

1. Admits the allegations in paragraphs 1 through 5 of the Complaint.
2. Admits the allegations in paragraphs 12 through 14, 17 through 23, 26 through 29, 32 and 34 of the Complaint.
3. Denies each and every other allegation in the Complaint besides the foregoing paragraphs, from paragraph 7 through paragraph 67 of the Complaint.

AFFIRMATIVE DEFENSES

4. Sinetos was never a managing member and did not make decisions for old Inteco or new Inteco, and is not liable for any of the entities' actions or omissions including the damages sought in this proceeding.
5. Sinetos was an innocent investor whose payments alleged in the Complaint are mischaracterized and actually consisted a return of principal and not interest or profit; in addition, said payments were not at any time improper or unlawful or in violation of any bankruptcy or debtor laws or otherwise; were not intentional or knowing violations of anyone or any other creditors' rights or any law; were not in violation of any bankruptcy code or other

law; and were made without any knowledge or notice on the part of Sinetos to any mismanagement, fraud or other wrongful conduct by other members Old Inteco and new Inteco for which Sinetos is not liable and for which said parties are solely liable: at a minimum any such liability which is denied is limited to the proportion of Sinetos' percentage interest in the entities.

6. In addition, the other creditors received their payments for many months before the relevant time period alleged herein and their no basis for the bankruptcy or the allegations of wrongdoing or intentional conduct, which is denied.
7. Based upon the foregoing, Sinetos is not liable for any of the amounts demanded in the Complaint, and Sinetos demands judgment dismissing the Complaint and this proceeding together with costs, disbursements and such other relief as is just and proper.

I hereby certify that the contents of this Answer are true and accurate to the best of my knowledge, and that a copy was served on the plaintiff's attorneys below.

Dated: March 18, 2013



PETER SINETOS

Defendant

To:

Clerk of the Bankruptcy Court
District of New Jersey
Martin Luther King Jr. Federal Building
50 Walnut Street
Newark, NJ 07102

Forman, Holt Eliades & Youngman
Attorneys for Plaintiff
80 Route 4 East, Suite 200
Paramus, NJ 07652
Attn: Harry M. Gutfleish, Esq.